

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

**UNITED STATES OF AMERICA,**

**Plaintiff,**

**v.**

**KYLE GREEN,**

**Defendant.**

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**4:19-CR-583-SRC-NAB**

**DEFENDANT’S PROPOSED CONDITIONS OF PRETRIAL RELEASE**

Defendant Kyle Green (“Green”), by and through undersigned counsel, files the following proposed conditions of pretrial release:

1. Green and his family have assets sufficient to post a cash bond in this case.
2. Green will reside with his parents at their home located at 217 West Deer Creek Road, O’Fallon, Illinois 62269.
3. Green will submit to home detention, monitored through either a GPS system or an electronic monitoring system.
4. Green will comply with any and all restrictions placed on use of the internet, computers, and cell phones.
5. Green will have no contact with any potential witnesses.
6. Green does not possess a passport and will agree not to apply for a passport.
7. Green will submit to random searches of his person, residence, computer, and cell phone.
8. Green will submit to any other conditions of release this Court deems appropriate.

Respectfully submitted,

**Margulis Gelfand, LLC**

/s/ William S. Margulis

WILLIAM S. MARGULIS, #37625

JUSTIN K. GELFAND, #62265

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ATTORNEYS FOR DEFENDANT

**Certificate of Service**

I hereby certify that the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the Office of the United States Attorney.

/s/ William S. Margulis

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